

## United States District Court

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

Tony Martinez-Lucas

## CRIMINAL COMPLAINT

Case Number: M-19-0921-M

IAE YOB: 1994  
Mexico

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my

knowledge and belief. On or about April 23, 2019 in Hidalgo County, inthe Southern District of Texas

(Track Statutory Language of Offense)

being then and there an alien who had previously been deported from the United States to Mexico in pursuance of law, and thereafter was found near Granjeno, Texas, within the Southern District of Texas, the Attorney General of the United States and/or the Secretary of Homeland Security, not theretofore having consented to a reapplication by the defendant for admission into the United States;

in violation of Title 8 United States Code, Section(s) 1326 (Felony)

I further state that I am a(n) Senior Patrol Agent and that this complaint is based on the following facts:

Tony Martinez-Lucas was encountered by Border Patrol Agents near Granjeno, Texas on April 23, 2019. The investigating agent established that the Defendant was an undocumented alien and requested record checks. The Defendant claims to have illegally entered the United States on April 23, 2019, near Hidalgo, Texas. Record checks revealed the Defendant was formally Deported/Excluded from the United States on January 22, 2019, through Brownsville, Texas. Prior to Deportation/Exclusion the Defendant was instructed not to return to the United States without permission from the U.S. Attorney General and/or the Secretary of Homeland Security. On June 27, 2017, the Defendant was convicted of 8 USC 1326 Being Found in the U.S. after Previous Deportation and was sentenced to twenty-seven (27) months confinement.

Continued on the attached sheet and made a part of this complaint:

Approved by Robert Guerra  
AUSA

Sworn to before me and subscribed in my presence,

April 24, 2019 - 8:28 a.m.Juan F. Alanis, U.S. Magistrate Judge

Name and Title of Judicial Officer

☐ Yes ☒ No

Signature of Complainant

Nicolas Cantu

Senior Patrol Agent

Signature of Judicial Officer